

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

HONEYWELL INTERNATIONAL INC.,

Plaintiff-Counterclaim Defendant,

v.

ECOER INC. and INVERTERCOOL, INC.,

Defendants-Counterclaim Plaintiffs.

Case No.: 1:24-cv-01464-PAE

**PLAINTIFF-COUNTERCLAIM DEFENDANT HONEYWELL INTERNATIONAL
INC.'S NOTICE OF MOTION TO DISMISS DEFENDANTS-COUNTERCLAIM
PLAINTIFFS ECOER INC. AND INVERTERCOOL, INC.'s COUNTERCLAIMS**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in support of Plaintiff-Counterclaim Defendant Honeywell International Inc.'s Motion to Dismiss Defendants-Counterclaim Plaintiffs Ecoer Inc. ("Ecoer") and InverterCool, Inc.'s ("InverterCool") (together, "Defendants") Counterclaims, dated May 2, 2024, the Declaration of Theresa M. House and the exhibit annexed thereto, and all pleadings and papers on file in this action, Plaintiff-Counterclaim Defendant Honeywell International Inc. hereby moves this Court before the Honorable Judge Paul A. Engelmayer, U.S. District Court, Southern District of New York, at Thurgood Marshall United States Courthouse, 40 Foley Square, New York, New York 10007, for an order dismissing Defendants' Counterclaims in the above-referenced action with prejudice, pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, as described in the Memorandum of Law.

May 2, 2024

Respectfully submitted,

/s/ Theresa M. House

Theresa M. House

Matthew T. Salzmänn

Angela R. Vicari

ARNOLD & PORTER KAYE SCHOLER LLP

250 West 55th Street

New York, NY 10019-9710

(212) 836-8000

Theresa.House@arnoldporter.com

Matthew.Salzmänn@arnoldporter.com

Angela.Vicari@arnoldporter.com

*Attorneys for Plaintiff-Counterclaim Defendant
Honeywell International Inc.*